

## Travis England

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**From:** Travis England  
**Sent:** Monday, May 6, 2019 5:25 PM  
**To:** Quinn,Robert E  
**Cc:** Claudia Wilner; Darius Charney  
**Subject:** BLRR v City of Buffalo - Plaintiffs' Lists of Proposed Search Terms & Custodians  
**Attachments:** BLRR v Buffalo\_Search Term List 5.6.19.docx; BLRR v Buffalo\_Custodian List 5.6.19.docx

Rob,

I have attached Plaintiffs' lists of proposed search terms and custodians.

As we explained in our November 15, 2018 email following our initial conferrals regarding Defendants' search for ESI, Plaintiffs believe that responsive documents and ESI will be in the possession of each Defendant, as well as various locations within the Buffalo Police Department ("BPD") and the City of Buffalo, including emails, digital and physical files, computers, backup servers, and similar locations of: (1) current and former Strike Force personnel and their supervisors; (2) current and former Housing Unit personnel and their supervisors; (3) current and former Division of Traffic Enforcement personnel and their supervisors; (4) current and former BPD Commissioners and their senior staff; (4) current and former Buffalo Traffic Violations Agency personnel; and (5) current and former staff of Defendant Brown overseeing BPD and BTVA activities. Based on the discovery Defendants have produced thus far, we have identified the specific individuals listed in the attachment.

Plaintiffs reserve their right to propose additional custodians and/or search terms should their relevance become apparent as discovery continues.

Thanks,  
Travis



**Travis W. England**

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